

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE:

CUMMINGS MANOOKIAN, PLLC,

Debtor.

BRIAN CUMMINGS,

Plaintiff,

v.

**BRETTON KEEFER; JEANNE
BURTON, TRUSTEE; and
AFSOON HAGH,**

Defendants.

**Case No, 3:19-bk-07235
Chapter 7
Judge Walker**

Adv. Proc. No. 3:23-ap-90036

**BRETTON KEEFER AND AFSOON HAGH'S
NOTICE OF APPEAL AND STATEMENT OF ELECTION**

Bretton Keefer and Afsoon Hagh ("Appellants"), through counsel, give notice of their appeal from the Bankruptcy Court's September 6, 2023 Order (Doc. 20, signed September 5, 2023). In furtherance of the same, Appellants state as follows.

Part 1: Identity of Appellant

1. The name of the Appellants are Bretton Keefer and Afsoon Hagh. Appellants are individually named defendants in the adversary proceeding brought by Brian Cummings.

Part 2: Subject of the Appeal

2. Appellants appeal from the Court's Order Denying Appellants' Motion to Dismiss or, in the Alternative, to Stay Pending Mediation and Arbitration (Doc. 20). The Order was electronically signed on September 5, 2023 and entered on the docket by the Clerk on September 6, 2023.

Part 3: Parties to the Appeal

3. The names of the Parties to the Order appealed from as well as the contact information for their attorneys are:

- a. Afsoon Hagh
Bretton Keefer
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- b. Brian Cummings
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- c. Debtor Cummings Manookian,
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- d. Trustee Jeanne Anne Burton
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- e. Creditor Grant, Konvalinka & Harrison, P.C.,
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Part 4: Election to have appeal heard by District Court

4. Appellants elect to have the appeal heard by the United States District Court rather than by the Bankruptcy Appellate Panel.

Date: September 8, 2023

Respectfully submitted,

/s/ John Spragens
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Attorney for Bretton Keefer and Afsoon Hagh

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed September 6, 2023 and served electronically upon all parties in interest or their counsel as indicated on the receipt issued by the Court's electronic filing system.

/s/ John Spragens